

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RE: LUEVENCIA STEELE,

CASE NO.: 16-30009

SSN: XXX - XX - 4777

CHAPTER 13

DEBTOR.

OBJECTION TO DEBTORS' CHAPTER 13 PLAN

CitiMortgage, Inc. ("Creditor") a creditor of the above referenced Luevencia Steele ("Debtor"), comes now and objects to Debtors' proposed Chapter 13 Plan filed by debtor's attorney, Richard D. Shinbaum, and for grounds says as follows:

1. The proposed Chapter 13 Plan does not reflect the correct amount of arrearage owed to Creditor. The Plan reflects a total amount of arrearage of \$17,1888.00. Creditor's records indicate that the Debtor is in arrears in the amount of \$24,806.77.

WHEREFORE, Creditor prays for the entry of an order denying confirmation of the Debtors' Chapter 13 Plan.

Dated this 11th day of March, 2016.

OF COUNSEL:

STEPHENS, MILLIRONS, P.C.
120 Seven Cedars Drive
Post Office Box 307
Huntsville, Alabama 35804
(256) 382-5500

BY: /s/JOSHUA B. WHITE
JOSHUA B. WHITE
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the attorney of record for debtor, Richard D. Shinbaum, rshinbaum@smclegal.com and the trustee of record for the debtor, Curtis C. Reding, ch13montgomery@ch13mdal.com electronically through the Court's electronic filing system.

Dated this 11th day of March, 2016.

/s/JOSHUA B. WHITE
JOSHUA B. WHITE

